

1 The parties, plaintiff Sean S. May, M.D. and defendants Unum Group (formerly known
2 as UnumProvident Corporation), and The Paul Revere Life Insurance Company are in the
3 process of discussing settlement, which may include setting an early mediation within the next
4 45 days. Accordingly, the parties, through their respective attorneys, respectfully request that the
5 court approve this stipulation and extend defendants' responsive pleading deadline and the initial
6 case management conference by 45 days.

7 Pursuant to Northern District Local Rule 6-1(a), the parties, hereby stipulate that
8 defendants shall have an extension to respond to the complaint from October 7, 2009 to and
9 including **November 23, 2009**.

10 The parties further stipulate to continue the Case Management Conference presently
11 scheduled for November 5, 2009 to **December 21, 2009**.

12 Good cause exists for the parties' stipulation and proposed order insofar the continued
13 dates will promote the public policy of encouraging parties to explore early resolution of
14 litigation.

15 **IT IS SO STIPULATED.**

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17 KNOX RICKSEN, LLP

18
19 Dated: October 2, 2009

By _____/s/_____
Thomas E. Fraysse
Attorney for Plaintiff
SEAN S. MAY, M.D.

22 WILSON, ELSER, MOSKOWITZ, EDELMAN &
23 DICKER LLP

24 Dated: October 2, 2009

By _____/s/_____
Thomas M. Herlihy
John T. Burnite
Attorney for Defendants

27 UNUM GROUP (formerly known as
28 UNUMPROVIDENT CORPORATION) and THE PAUL
REVERE LIFE INSURANCE COMPANY

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STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE AND TO CONTINUE CASE MANAGEMENT
CONFERENCE; [PROPOSED] ORDER

Case No.: C09-01537VRW (ADRO

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ORDER

IT IS SO ORDERED that defendants shall have an extension to respond to the complaint from October 7, 2009 to and including **November 23, 2009**. It is further ordered that the Case Management Conference is continued from November 5, 2009 to ~~December 21, 2009~~ December 17, 2009 at 3:30 PM.

Date: October 6, 2009

VAUGHN R. WALKER
United States District Chief Judge

